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**REMARKS**

In response to the Office Action dated July 29, 2005, the Applicant has amended Claims 1, 3-4, 8, 11, 13-14 and 17-18 and canceled claims 2 and 12. New Claims 21-25 have been added. Thus, Claims 1, 3-11 and 13-25 remain pending in the Application. Reconsideration of the Claims, as amended, is respectfully requested.

The Official Action maintained the rejections raised in the previous Office Action and provided comments to the previous arguments made in Applicant's response. Claims 1, 6-8, 10-11, 16-18 and 20 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Perlman* in view of *Coyle*. Claim 1 has been amended to more particularly recite that the method occurs over an IP network and includes the steps of:

confirming that the IP network address is associated  
with an authorized geographic location; and  
validating the client system to have access to the  
server resource in accordance with such confirmation.

Thus, within the method described in Applicant's Claim 1 between a client system and a server system, a confirmation must be made that the IP Network address is associated with an authorized geographic location, and the client system is validated to have access to the server resource responsive to the confirmation. These steps are not disclosed by the combination of *Perlman* and *Coyle*.

The column 9 reference in *Perlman* describes how the locality determination logic compares a client network address with a block of client network addresses to determine a point of presence node that is local for the corresponding client network address. The recited disclosure while describing determining a point of presence node that is local to the client network address does not describe confirming an IP address is associated with an authorized geographic location. Furthermore, the disclosure at column 16, lines 15-22 describes how the WebTV server matches two clients with each other using geographical location of the clients as indicated by their network address. While the disclosure indicates that there is a geographical location associated with the network address, there is

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no description of confirming an IP network is associated with an authorized geographic location and validating this client system based on the confirmation.

The Official Action further admits that the *Perlman* reference does not explicitly explain permitting or denying access to the server according to the geographic location. And recites the *Coyle* reference as disclosing this limitation. As mentioned previously, Claim 1 has been amended to recite validating the client system to have access to the server resource responsive to the confirmation of authorized geographic location. The *Coyle* reference does not describe validating a client system to access a server resource responsive to confirmation of authorized geographic location. The *Coyle* reference merely describes how IDs may be used to regulate usage in, for example, states having laws forbidding gambling. Nothing in either of the *Perlman* or *Coyle* references describe the step of validating the client system to have access to a server resource responsive to confirmation of authorized geographic location. Therefore, the Applicant respectfully submits that Claim 1, and all claims dependent therefrom, are distinguishable from the art of record and a Notice of Allowance is respectfully requested.

Claim 8 has been amended to more particularly recite the step of "selectively receiving access to the server resource over the IP network depending on a validation of the client system by the server system by confirming that the IP network address corresponds to an authorized geographic location."

As described previously, the combination of *Perlman* and *Coyle* do not describe the occurrence of a process as described herein over an IP network. Furthermore, the combination of *Perlman* and *Coyle* do not describe selectively receiving access to a server resource depending on a validation of the client system by the server system responsive to confirmation that the IP network address corresponds to an authorized geographic location for reasons similarly to those discussed above with respect to Claim 1. Therefore, the Applicant respectfully submits that Claim 8, and all claims dependent therefrom, are distinguishable from the art of record and a Notice of Allowance is respectfully requested.

With respect to Claim 11 and 18, these claims include limitations similar to those of Claims 1 and 8 respectively. Therefore, the Applicant respectfully submits that Claims 11 and 18, and all claims dependent therefrom, are allowable over the art of record for similar reasons.

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Claims 2 and 12 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Perlman* in view of *Coyle* and further in view of *Cable Modem Info*. Applicant respectfully submits that Claims 2 and 12, being dependent upon previously discussed Claims 1 and 11, are patentable over the art of record as the *Cable Modem Info* reference fails to overcome the shortcomings of *Perlman* and *Coyle*. A Notice of Allowance is respectfully requested.

Claims 3 and 13 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Perlman* in view of *Coyle* and further in view of *Cable Modem Info* and *Padmanabhan, et al.* Applicant respectfully submits that Claims 3 and 13, being dependent upon previously discussed Claims 1 and 11 respectively, are allowable over the art of record as the *Cable Modem Info* and *Padmanabhan, et al.* references fail to overcome the shortcomings of *Perlman* and *Coyle*.

Claims 4 and 14 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Perlman* in view of *Coyle* and further in view of *Cable Modem Info* and *Padmanabhan, et al.* and *Alcorn*. Applicant respectfully submits that these claims, being dependent upon previously discussed Claims 1 and 11, respectively, are allowable for similar reasons as the recited referenced fail to overcome the shortcomings of *Perlman* and *Coyle*.

Claims 1, 4, 7, 8, 11, 14, 17 and 18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Beadle* in view of *Sharp*. As mentioned previously, Claim 1 has been amended to include the limitations of a method for accessing a server system from a client system through an IP network and more specifically to recite the steps of "confirming that the IP network address is associated with an authorized geographic location," and "validating the client system to have access to the server resource in accordance with such confirmation." These limitations are not disclosed within the *Beadle* and *Sharp* references, nor are they disclosed by a combination thereof. Therefore, the Applicant respectfully submits that Claim 1, and all claims dependent therefrom, are distinguishable from the art of record, and a Notice of Allowance is respectfully requested.

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Claim 8 has been amended to include the limitations of "sending an IP network address of the client system to the server system over the IP network," and "selectively receiving access to the server resource over the IP network depending on a validation of the client system by the server system by confirming that the IP network address corresponds to an authorized geographic location." These limitations are not disclosed by the combination of *Beadle* and *Sharp*. Therefore, the Applicant respectfully submits that Claim 8, and all claims dependent therefrom, are distinguishable from the art of record and a Notice of Allowance is respectfully requested.

Claims 11 and 18 include limitations similar to those of Claims 1 and 8, respectively. Therefore, the Applicant respectfully submits that these claims, and all claims dependent therefrom, are allowable for similar reasons. A Notice of Allowance is respectfully requested.

Applicant has added new Claim 21. The *Official Action* stated that "one of ordinary skill would recognize that a telephone is inherently defined by geographic location . . ." Additionally, *Perlman* teaches that a telephone number as the client network address (Col. 6, lines 46-48) and that "[t]he area code is a typical component of a client telephone number [and] is associated with a well defined geographical region . . ." (Col. 12, lines 4-6). As such, *Perlman* does not teach a geographically agnostic network address.

In the first Office Action, the *Official Action* acknowledged that *Perlman* only "teaches the use of a client's geographic location information in optimizing or differentiating server resources." Indeed, because *Perlman* does not teach a geographically agnostic address, it teaches away from the additional step of confirming that a geographically agnostic network address is associated with an authorized geographic location. *Perlman* teaches that the telephone number, itself, combined with known ANI and Caller ID services provide a "significant level of security for network transactions" (Col. 5, lines 7-8) without the involvement of geographic locations for validation or verification purposes and therefore further teaches away from validating the client system to have access to the service resource in accordance with a confirmation that the geographically agnostic network address is associated with an authorized geographic location. Furthermore, the *Coyle* reference merely describes how IDs may be used to regulate usage in, for example, states having laws forbidding gambling. Nothing in either of


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the *Perlman* or *Coyle* references describe the steps of confirming that the geographically agnostic network address is associated with an authorized geographic location, and validating the client system to have access to the server resource in accordance with such confirmation. Therefore, the Applicant respectfully submits that Claim 21 is distinguishable from the art of record and a *Notice of Allowance* is respectfully requested.

In view of the foregoing amendments and comments, the Applicant respectfully submits that all pending claims are allowable over the art of record and a notice of allowance is respectfully requested.

Respectfully submitted,  
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